

NICHOLAS A. TRUTANICH  
United States Attorney  
DEBORAH LEE STACHEL  
Regional Chief Counsel, Region IX  
Social Security Administration  
MICHAEL K. MARRIOTT, CSBN 280890  
Special Assistant United States Attorney  
160 Spear Street, Suite 800  
San Francisco, California 94105  
Telephone: (415) 977-8985  
Facsimile: (415) 744-0134  
E-Mail: [Michael.Marriott@ssa.gov](mailto:Michael.Marriott@ssa.gov)

Attorneys for Defendant

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA  
LAS VEGAS DIVISION**

TALITHA BROUGHTON,	)	Case No: 2:18-cv-02188-JAD-GWF
	)	
Plaintiff	)	
	)	<b>STIPULATION FOR EXTENSION OF</b>
v.	)	<b>TIME TO FILE DEFENDANT'S CROSS</b>
	)	<b>MOTION TO AFFIRM</b>
NANCY A. BERRYHILL, Acting	)	
Commissioner of Social Security,	)	<b>(First Request)</b>
	)	
Defendant.	)	

---

Defendant Nancy A. Berryhill, Acting Commissioner of Social Security, hereby requests an extension of time of thirty days to Wednesday, May 29, 2019, to prepare and file her cross motion to affirm. This is the Commissioner's first request for an extension.

Defendant respectfully requests this extension of time because of a very heavy workload, including ten district court merits briefs due in the next four weeks, as well as two Ninth Circuit responsive briefs to complete.

1 On April 29, 2019, Plaintiff's counsel informed Defendant by email that he had no  
2 objection to this extension.

3  
4 Respectfully submitted,

5 Date: April 29, 2019

LAW OFFICES OF LAWRENCE D. ROHLFING

6 By: /s/\*Cyrus Safa

7 CYRUS SAFA

8 \*authorized by email April 29, 2019

9 Attorney for Plaintiff

10 Date: April 29, 2019

NICHOLAS A. TRUTANICH

11 United States Attorney

12 By: /s/Michael K. Marriott

13 MICHAEL K. MARRIOTT

14 Assistant Regional Counsel

Attorneys for Defendant

15 Of Counsel

16 Jeffrey Chen

17 Assistant Regional Counsel

18 Social Security Administration

19  
20 IT IS SO ORDERED.

21  
22 DATE: 4/30/2019



23 HONORABLE GEORGE FOLEY, JR.

24 United States Magistrate Judge